

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

-----X

In re: PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.<sup>1</sup>

-----X

INFORMATIVE  
**MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD REGARDING JUNE 16–17, 2021 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for June 16–17, 2021, Omnibus Hearing* [Case No. 17-3283, ECF No. 16898], the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> the Oversight Board respectfully states as follows:

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. The following parties will appear telephonically to address questions and comments, if any, related to the Oversight Board's status report: Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP.

2. Scott P. Cooper of Proskauer Rose LLP will appear telephonically and seek to be heard on *Cobra Acquisitions LLC's Motion to Lift the Stay Order* [**Case No. 17-3283, ECF No. 16328; Case No. 17-4780, ECF No. 2428**].

3. Lary A. Rappaport of Proskauer Rose LLP will appear telephonically and seek to be heard on the *Defendant Puerto Rico Electric Power Authority's Memorandum of Law in Support of Motion to Dismiss Counts I and II of Plaintiffs' Second Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(1) and (6)* [**Adv. Case No. 20-115, ECF No. 41**].

4. Martin Bienenstock, Brian Rosen, Scott P. Cooper, and Lary A. Rappaport reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

*[Remainder of page intentionally left blank]*

**WHEREFORE**, the parties respectfully request that the Court take notice of the foregoing.

Dated: June 11, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock  
Martin J. Bienenstock  
Brian S. Rosen  
Paul V. Possinger  
Ehud Barak  
(Admission *pro hac vice*)  
**PROSKAUER ROSE LLP**  
Eleven Times Square  
New York, NY 10036  
Tel: (212) 969-3000  
Fax: (212) 969-2900

*Attorneys for the Financial Oversight and  
Management Board as representative for the  
Debtors*

/s/ Hermann D. Bauer  
Hermann D. Bauer  
USDC No. 215205  
**O'NEILL & BORGES LLC**  
250 Muñoz Rivera Ave., Suite 800  
San Juan, PR 00918-1813  
Tel: (787) 764-8181  
Fax: (787) 753-8944  
*Co-Attorneys for the Financial Oversight and  
Management Board as representative for the  
Debtors*